

Case No. 18-1342

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

AMERICAN SALES & MANAGEMENT
ORGANIZATION, LLC d/b/a
EULEN AMERICA,

Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,
Respondent.

MOTION FOR LEAVE TO INTERVENE

Pursuant to Rule 15(d), F.R.A.P., Service Employees International Union, Local 32BJ (“Local 32BJ”), moves for leave to intervene. Local 32BJ was the charging party before the National Labor Relations Board in this case and is, therefore, a party entitled to intervene in the proceedings to review the Board’s decision. *See Automobile Workers v. Scofield*, 382 U.S. 205 (1965).

Respectfully submitted,

Dated: January 23, 2019

/s/ Jessica D. Ochs

Jessica D. Ochs

Associate General Counsel

SEIU Local 32BJ

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ADDENDUM – CERTIFICATE OF PARTIES AND AMICI

All parties who appeared before the National Labor Relations Board, or who are appearing before this Court are as follows:

American Sales & Management Organization, LLC, d/b/a Eulen America

National Labor Relations Board

Service Employees International Union, Local 32BJ

/s/ Jessica D. Ochs

Jessica D. Ochs

Attorney for Intervenor SEIU Local 32BJ

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2019, I electronically filed a copy of the foregoing Motion for Leave to intervene with the Clerk for the United States Court of Appeals for the District of Columbia Circuit using CM/ECF.

/s/ Jessica D. Ochs

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